

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709
REEM BLAIK
Assistant United States Attorney
Nevada Bar No. 16386
501 South Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Fax: (702) 388-6787
Reem.Blaik@usdoj.gov

Attorneys for Federal Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Wences Maria Martinez; Maor Eliyahu,

Plaintiffs,

v.

United States Citizenship and
Immigration Services; Merrick Garland,
in his official capacity, Attorney General;
United States Department of Homeland
Security; Alejandro N. Mayorkas, in his
official capacity, Secretary of U.S.
Department of Homeland Security; Ur M.
Jaddou, in her official capacity, Director
of United States Citizenship and
Immigration Services; Amanda Haury, in
her official capacity, Field Office Director
of the Las Vegas Service Center of United
States Citizenship and Immigration
Services,

Defendants.

Case No. 2:24-cv-01220-JAD-BNW

**Stipulation and Order to Extend Federal
Defendants' Responsive Pleading
Deadline**

(First Request)

Pursuant to FRCP 6(b)(1)(A), LR IA 6-1, and LR 26-3, Plaintiffs Wences Maria
Martinez and Maor Eliyahu ("Plaintiffs") and Federal Defendants United States Citizenship
and Immigration Services; Merrick Garland, in his official capacity, Attorney General;
United States Department of Homeland Security; Alejandro N. Mayorkas, in his official
capacity, Secretary of U.S. Department of Homeland Security; Ur M. Jaddou, in her official
capacity, Director of United States Citizenship and Immigration Services; Amanda Haury,

in her official capacity, Field Office Director of the Las Vegas Service Center of United States Citizenship and Immigration Services (“Federal Defendants”) request and stipulate to extending Federal Defendants’ deadline to file a responsive pleading to Plaintiffs’ Complaint by forty-five (45) days. This request would move Federal Defendants’ deadline to file a responsive pleading to Plaintiffs’ Complaint to **October 31, 2024**. The standard for extending time is good cause. *See* FRCP 6(b)(1)(A).

Federal Defendants require this brief extension of time because they are making diligent efforts to evaluate and adjudicate Plaintiffs’ immigration applications, which are the subject of their Complaint. Accordingly, Federal Defendants have good cause to request a 45-day extension to file a responsive pleading to Plaintiffs’ Complaint. This is the first request to extend Federal Defendants’ responsive pleading deadline.

Respectfully submitted this 12th day of August 2024.

IMMIGRATION LEGAL
CONSULTING, LLC

JASON M. FRIERSON
United States Attorney

/s/ Shaina Plaksin
SHAINA PLAKSIN
8275 S. Eastern Ave., Suite 200
Las Vegas, NV 89123
Attorney for Plaintiffs

/s/ Reem Blaik
REEM BLAIK
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Attorneys for Federal Defendants

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: August 13, 2024